

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**NOTICE OF PLAINTIFFS' PROPOSED SCHEDULE**

Curling and Coalition Plaintiffs hereby propose the schedule below.

Plaintiffs' proposed schedule, which allows for full discovery and trial in early 2020, also includes time for briefing and a hearing on the preliminary injunctions Plaintiffs will be filing with respect to Georgia's continued use of the vulnerable and insecure Direct-Recording Electronic Voting Machines.

<b>Case Event</b>	<b>Date</b>
Status Conference	Friday, May 24, 2019
Answers to SAC and TAC Due	Wednesday, May 29, 2019
Close of Fact Discovery <sup>1</sup>	November 22, 2019

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<sup>1</sup> All responses to discovery requests, including production of documents or data in response to requests pursuant to Fed. R. Civ. P. 34, shall be due within 14 calendar days of receipt of any such request. Service of discovery requests and responses may be effected by email on counsel of record for all parties.

Simultaneous Expert Reports	December 6, 2019
Simultaneous Expert Rebuttal Reports	December 20, 2019
Close of Expert Discovery	January 10, 2020
Trial Readiness	February, 2020

Case Event	Date
Plaintiffs' Preliminary Injunction Filings	Friday, May 31, 2019
Defendants' Responses to Preliminary Injunctions Due	Tuesday, June 11, 2019
Plaintiffs' Preliminary Injunction Replies Due	Friday, June 18, 2019
Preliminary Injunction Hearing	Week of June 24, 2019

Dated: May 23, 2019

Respectfully submitted,

/s/ David D. Cross  
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John P. Carlin (*pro hac vice*)  
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**IN THE UNITED STATES DISTRICT COURT  
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**v.**

**BRIAN KEMP, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross  
David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2019, a copy of the foregoing **NOTICE OF PLAINTIFFS' PROPOSED SCHEDULE** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross  
David D. Cross